



e-ISSN: 3026-5827

Enigma in Education

Journal website: <https://enigma.or.id/index.php/edu>



Learning from Neighbors: A Comparative Policy Analysis of Tax Education Integration in the High School Curricula of Indonesia and Malaysia

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ARTICLE INFO

Keywords:

Comparative policy analysis
Curriculum integration
Malaysia
Tax compliance
Tax education

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All authors have reviewed and approved the final version of the manuscript.

<https://doi.org/10.61996/edu.v3i1.96>

ABSTRACT

Nations across Southeast Asia are grappling with the challenge of enhancing tax compliance to fund national development. This study addresses this issue by examining the divergent policy pathways for high school tax education in two neighboring countries: Indonesia and Malaysia. While both nations recognize the importance of cultivating tax awareness among youth, their approaches to curriculum integration differ significantly. This study employed a qualitative comparative policy analysis. The research systematically examined and contrasted official policy documents from Indonesia's Ministry of Education, Culture, Research, and Technology (*Kemendikbudristek*) and the Directorate General of Taxes (DJP), with those from Malaysia's Ministry of Education (KPM) and the Inland Revenue Board of Malaysia (IRBM). The analysis focused on four key dimensions: policy rationale, curricular placement, institutional collaboration, and implementation strategy. Data was sourced from national curriculum frameworks, ministerial decrees, tax authority publications, and strategic plans issued between 2019 and 2024. A thematic analysis was conducted to identify and compare the core characteristics of each nation's approach. The analysis revealed two distinct models. Malaysia has pursued a formal, centralized integration model, embedding tax education as a mandatory topic within the Form 5 Mathematics curriculum since 2021. This ensures universal and systematic delivery by teachers. In contrast, Indonesia has adopted an emerging, decentralized model characterized by extracurricular outreach programs, such as *Pajak Bertutur*, led by the DJP. While Indonesia's new *Kurikulum Merdeka* presents significant opportunities for formal integration, its implementation remains ad-hoc and dependent on regional initiatives. Malaysia's strategy offers a clear model of systemic integration that Indonesia could learn from. However, Indonesia's *Kurikulum Merdeka* and its emphasis on project-based learning provide a unique opportunity to embed tax education more holistically as a component of civic and economic literacy, rather than solely as a mathematical exercise. The study concludes that for Indonesia to advance its tax education agenda, a more robust and operational partnership between the DJP and *Kemendikbudristek* is essential to transition from sporadic outreach to sustainable, curriculum-integrated education.

1. Introduction

The cultivation of a robust tax culture is a cornerstone of sustainable national development, providing the fiscal lifeblood for public services,

infrastructure, and social welfare programs.¹ Across the globe, and particularly within the developing economies of the Association of Southeast Asian Nations (ASEAN), governments have increasingly

recognized that enforcement and penalties alone are insufficient to ensure long-term, voluntary tax compliance.² Consequently, a paradigm shift has occurred, moving towards proactive strategies that foster an intrinsic sense of civic duty and tax morale among citizens. Central to this strategy is the role of tax education, especially when targeted at young people, who represent the next generation of taxpayers and economic actors. By instilling an early understanding of the purpose and function of taxation, nations aim to build a more compliant and engaged citizenry from the ground up.³

This imperative is particularly acute in Indonesia and Malaysia, two of ASEAN's largest economies that share similar developmental aspirations yet face persistent challenges in optimizing domestic revenue mobilization. Indonesia has long struggled with a low tax-to-GDP ratio, which has consistently been among the lowest in the Asia-Pacific region, constraining its capacity to fund its ambitious national development goals, including the "Indonesia Emas 2045" vision.⁴ In response, the Indonesian Directorate General of Taxes (DJP) has actively pursued educational outreach through its Tax Awareness Inclusion Program, most visibly through annual, event-based initiatives like *Pajak Bertutur* ("Tax Speaks") and *Tax Goes to School*. These programs have involved tax officials visiting schools to deliver lectures and activities, representing a direct, albeit extracurricular, effort to engage students.⁵

Similarly, Malaysia has identified low tax compliance as a significant national issue, particularly following its transition to a Self-Assessment System (SAS), which places a greater onus on individual taxpayers to understand and fulfill their obligations. Studies have pointed to a degree of tax illiteracy among the Malaysian public, prompting calls from both researchers and the Inland Revenue Board of Malaysia (IRBM) for a more structured approach to tax education.⁶ Like its Indonesian counterpart, the IRBM has also engaged in informal educational programs such as tax camps and seminars to raise awareness.

Despite these shared challenges and objectives, the two nations have recently embarked on markedly different policy trajectories regarding the formal

integration of tax education into their national high school curricula. In 2021, Malaysia took a decisive step by embedding taxation as a formal topic within the secondary school Mathematics curriculum. This move signaled a commitment to a universal, systematic, and curriculum-driven approach. Indonesia, concurrently, has been undergoing its own major educational reform with the rollout of the *Kurikulum Merdeka* (Merdeka Curriculum).⁷ This new framework, established under the authority of the Ministry of Education, Culture, Research, and Technology (*Kemendikbudristek*), emphasizes flexible, student-centered, and project-based learning. While this curriculum presents clear and powerful opportunities for integrating tax education, particularly within the Economics subject and the innovative *Projek Penguatan Profil Pelajar Pancasila* (P5) component, its actual implementation for tax education has remained largely decentralized and has not yet coalesced into a national, mandatory strategy comparable to Malaysia's.⁸

This divergence presents a critical opportunity for comparative policy analysis. While a body of literature exists on tax education within each country, there is a scarcity of research that systematically compares the policy architecture and implementation strategies of these two neighboring nations.⁹ Existing studies in Indonesia have tended to evaluate the effectiveness of specific outreach programs, often finding that their impact is conditional on students' prior knowledge and concluding that more continuous education is needed. In Malaysia, research has highlighted strong public support for formal tax education and has begun to explore the influence of the newly integrated curriculum on student awareness. However, a direct, cross-national analysis of the policy mechanisms that underpin these different approaches has been absent.

This study addresses this critical gap in the literature. The novelty of this research lies in its direct and detailed comparative policy analysis of the formal high school tax education frameworks in Indonesia and Malaysia. Rather than evaluating student outcomes, this study dissects the policy architecture itself, providing a unique macro-level perspective on how two proximate nations are tackling the same

fundamental challenge through different educational philosophies and institutional arrangements. By "learning from neighbors," this research moves beyond country-specific evaluations to generate cross-contextual insights.¹⁰

The aim of this study was threefold. First, it sought to systematically map and describe the tax education policies and curriculum structures currently in place for high school students in both Indonesia and Malaysia. Second, it aimed to conduct a rigorous comparative analysis of these two approaches, examining the underlying policy rationales, the specific mechanisms of curriculum integration, the nature of inter-agency collaboration, and the intended implementation strategies. Third, by juxtaposing Malaysia's formalized model with Indonesia's emerging framework, the study intended to derive a set of actionable, evidence-based policy lessons that can inform and guide Indonesia's ongoing efforts to build a sustainable and effective national tax education strategy within the transformative context of the *Kurikulum Merdeka*.

2. Methods

This study employed a qualitative comparative policy analysis methodology. This approach is particularly well-suited for examining and explaining policy outputs and outcomes across different political and institutional contexts. It allows for an in-depth, contextualized examination of how different governments address similar policy challenges, enabling the identification of best practices, innovations, and potential pitfalls. The methodology is grounded in the systematic study of policies across different jurisdictions to identify patterns, differences, and similarities, thereby providing valuable insights for policymakers. The selection of Indonesia and Malaysia as cases for this comparative analysis was based on a "most similar systems design" logic. This design involves comparing cases that share numerous contextual similarities but differ in the specific phenomenon under investigation—in this instance, the formal integration of tax education into the high school curriculum. Both Indonesia and Malaysia are neighboring ASEAN member states with shared

cultural roots, similar economic development goals, and comparable challenges related to tax compliance and revenue generation. However, they have adopted divergent strategies for youth tax education. Malaysia has implemented a formal, top-down integration into a core subject, while Indonesia's approach has been more ad-hoc and is currently at a critical juncture with the introduction of a new, flexible curriculum. This contrast within a context of broad similarity makes for a powerful comparative study, allowing for the isolation and analysis of the policy differences and their potential implications.

The research was based on a comprehensive analysis of official policy documents and related publications from both countries, spanning the period from 2019 to 2024. This method of source content analysis is a cornerstone of comparative research in education and policy. Data were collected from the official websites and digital repositories of the relevant government ministries and agencies. For the Indonesian case, the primary data sources included foundational documents for the *Kurikulum Merdeka*, such as ministerial decrees which outline the curriculum's structure and principles. Specific attention was paid to the Learning Outcomes for the Economics subject at the senior high school level and the official guides for the Project to Strengthen the Pancasila Student Profile (P5). Additionally, regulations and official publications from the Directorate General of Taxes (DJP) describing the framework and implementation of programs like *Pajak Bertutur* and the broader Tax Awareness Inclusion Program were analyzed. For the Malaysian case, the primary data sources included an analysis of the *Kurikulum Standard Sekolah Menengah* (KSSM), with a specific focus on the *Dokumen Standard Kurikulum dan Pentaksiran* (DSKP) for Form 5 Mathematics, which contains the learning standards for the taxation topic. Broader policy documents, such as the Malaysia Education Development Plan, were also reviewed to understand the overarching educational philosophy and goals. Finally, annual reports, press releases, and information on educational programs published by the Inland Revenue Board of Malaysia (IRBM) were examined.

A thematic analysis approach was used to systematically analyze the collected documents. Thematic analysis is a flexible and widely used qualitative method for identifying, analyzing, and reporting patterns within data, making it highly suitable for interpreting policy documents. The analysis followed a structured, multi-stage process. First, the researchers engaged in an immersive reading and re-reading of all collected policy documents to gain a comprehensive understanding of the content, context, and language used in each country. Second, the documents were systematically coded to identify key features and concepts relevant to the research questions, which involved highlighting segments of text related to the goals, content, delivery methods, and institutional roles in tax education. Third, the initial codes were then collated and organized into potential themes. This was a top-down, or theoretical, thematic analysis, driven by a pre-defined analytical framework designed for the comparison. The framework consisted of four primary comparative themes: the policy rationale and objectives, the curricular placement and content, the nature of institutional collaboration, and the implementation strategy and pedagogy. Finally, the developed themes were reviewed against the coded data and the entire dataset to ensure they formed a coherent and accurate representation of each country's policy approach. The final analysis involved synthesizing the findings for each country under these four thematic headings, allowing for a direct and structured comparison of the two policy models.

3. Results

The comparative analysis of policy documents from Indonesia and Malaysia revealed two distinct and divergent models for the integration of tax education at the high school level. Malaysia has adopted a formal, centralized, and subject-specific integration, whereas Indonesia is characterized by an emerging, decentralized, and extracurricular-focused approach, albeit with significant latent potential for formal integration within its new curriculum framework.

The approach to tax education in Indonesia was found to be driven primarily by the fiscal imperatives of the state, with implementation characterized by a decentralized, event-based model that operates largely outside the formal, mandatory curriculum. The primary impetus for tax education in Indonesia stemmed from the nation's persistent struggle with a low tax-to-GDP ratio and the desire to secure long-term fiscal sustainability to achieve the "Indonesia Emas 2045" vision. The core policy instrument was the DJP's Tax Awareness Inclusion Program, launched in 2014 with the long-term goal of instilling an intrinsic motivation to pay taxes among all citizens, particularly the youth. The objective was framed as a long-term investment in building a national "tax morale" to create a culture of sustainable compliance. The official discourse frequently connected tax payment to patriotism and the concept of *gotong royong* (mutual cooperation), framing it as a collective duty for national development. A defining characteristic of the Indonesian model was the absence of tax education as a standalone, mandatory subject within the national high school curriculum. Taxation was addressed only sporadically within existing subjects like Economics and Civic Education. Consequently, the primary vehicles for delivering tax education were extracurricular programs initiated and led by the DJP. The most prominent of these was the *Pajak Bertutur* program, an annual, one-day event where tax officials visit schools across the country. The content for high school students was typically centered on the theme "taxes are the backbone of the country," covering an introduction to the Indonesian tax system and the role of taxes in the state budget. Other similar initiatives, such as *Tax Goes to School*, followed a similar event-based model. The introduction of the *Kurikulum Merdeka* presented a significant, though largely untapped, opportunity for formal integration. The curriculum's senior high school Economics subject includes learning outcomes related to understanding economic problems, which could naturally accommodate taxation concepts.

Table 1. Comparing high school tax education policies in Indonesia and Malaysia.

Policy Dimension	Indonesia	Malaysia
Main Approach	Community-Focused & Developing Approach: Tax education is mainly handled through special programs run by the tax office that visit schools. The goal is to teach students that paying taxes is an important part of being a good citizen and contributing to the community (a concept known as <i>gotong royong</i>).	Structured & Required School Subject: Tax education is a required topic within a core class (Mathematics) for all older high school students. The focus is on teaching the practical, real-world skills needed to understand and calculate taxes.
Reason for the Policy	Main Goal: To increase the amount of tax collected for national development and to build a long-term culture where people pay taxes willingly because they understand its importance.	Main Goal: To make sure future citizens understand how to calculate and report their own taxes correctly, which is necessary under Malaysia's Self-Assessment System.
Where It's Taught	Primarily Special Events, Not Regular Classes: <ul style="list-style-type: none"> • Programs like "<i>Pajak Bertutur</i>" (Tax Speaks) are one-day events held at schools. • The content is general, focusing on why taxes are the "backbone of the country." • There is potential to include it in regular Economics classes or as a special project (P5) under the new <i>Kurikulum Merdeka</i>, but this is not yet standard practice everywhere. 	A Required Topic in Math Class: <ul style="list-style-type: none"> • It is a mandatory part of the "Consumer Mathematics" section for older high school students. • The content is very specific and standardized for all schools, covering why taxes exist, the different types of taxes, and how to do the calculations.
Who is in Charge?	Partnership in Early Stages: While there is an official agreement between the tax office (DJP) and the Ministry of Education, in practice the tax office leads and implements most of the programs on its own. The collaboration is not yet deeply integrated into the curriculum design process.	Strong & Active Partnership: The tax agency (IRBM) and the Ministry of Education worked together closely to create and implement the curriculum. The education ministry provides the schools and teachers, while the tax agency provides the expert knowledge on taxes.
How It's Taught	"Visiting Expert" Approach: Tax officials, who are experts on taxes but not necessarily trained teachers, visit schools to give lectures and lead activities. The quality and style of these events can vary greatly from one region to another.	Standard Classroom Teaching: Regular math teachers deliver the lessons as part of their normal teaching duties, following a standard national guide. This ensures all students receive the same core information in a consistent way, with a focus on solving tax-related math problems.

More profoundly, the curriculum's mandatory, cross-disciplinary Project to Strengthen the Pancasila Student Profile (P5) component was identified as an ideal framework for contextual, project-based tax education. However, the analysis of policy documents revealed that this integration was not yet systematic or mandated at a national level. The policy framework for tax education in Indonesia was built upon a formal partnership between the DJP and *Kemendikbudristek*.

This collaboration was formalized through agreements aimed at implementing the Tax Awareness Inclusion program within the education system. However, the analysis of implementation reports and scholarly articles indicated that this collaboration, while established at the national level, was still in its early stages in terms of deep, operational integration. The execution of educational programs was heavily reliant on the initiative of regional DJP offices, which were

responsible for liaising with local schools. This created a dynamic where the tax authority was the primary driver of educational outreach, with the education ministry acting more as a facilitator or partner rather than a co-owner of a shared curriculum. The dominant implementation strategy was a "push" model of information dissemination. Tax officials, as subject matter experts, visited schools to deliver pre-packaged content through methods like lectures, videos, and games. While this ensured technical accuracy, it also created two significant challenges. First, the delivery was highly heterogeneous, with the quality and pedagogical approach varying significantly across regions depending on the resources and innovation of the local tax office. Second, a potential pedagogical skills gap was identified; tax officials are experts in taxation but not necessarily in adolescent pedagogy, while teachers possess pedagogical skills but may lack deep tax knowledge. This model contrasted sharply with the constructivist, student-centered philosophy of the *Kurikulum Merdeka*, which emphasizes inquiry-based and project-based learning.

In contrast to Indonesia, Malaysia's approach was characterized by a decisive policy shift towards formal, mandatory, and systematic integration of tax education into the national secondary school curriculum, driven by a clear collaboration between its fiscal and educational authorities. Similar to Indonesia, the rationale for enhancing tax education in Malaysia was rooted in concerns over low tax compliance and a perceived lack of tax literacy among the public, which was seen as a critical issue under the country's Self-Assessment System (SAS). The overarching goal was to use education as a cost-effective, long-term tool to foster voluntary compliance by ensuring future taxpayers understood the system and their responsibilities. Public perception surveys indicated overwhelming support for introducing formal tax education in schools, providing a strong social mandate for the policy change. The most significant finding was the formal integration of tax education into the national curriculum, effective from 2021. The policy documents, specifically the Dokumen Standard Kurikulum dan Pentaksiran (DSKP) for KSSM Mathematics Form 5, clearly delineated

"Taxation" as a learning area under the broader theme of "Consumer Mathematics." The DSKP outlined specific Learning Standards for this topic, which included explaining the purpose of taxation, describing various types of taxes and the consequences of tax evasion, performing calculations involving various taxes, and solving problems involving taxation. This placement within Mathematics framed taxation primarily as a practical, calculative skill essential for financial literacy. The successful integration was predicated on a strong, collaborative effort between the Ministry of Education (KPM) and the Inland Revenue Board of Malaysia (IRBM). While the KPM was responsible for the curriculum design and standards, the IRBM played a crucial role in providing the technical expertise and likely contributed to the content development. This partnership was explicitly recommended in prior research and public discourse. This formal integration was complemented by the IRBM's ongoing informal education programs, such as Tax Camps and workshops, creating a dual-track approach to raising tax awareness. The Malaysian model represented a systemic "pull" model, where tax education was integrated into the core duties of classroom teachers. By making it a mandatory part of the Mathematics syllabus, the policy ensured universal reach to all Form 5 students within the national school system. The DSKP served as the standardized guide for all teachers, ensuring a degree of consistency in content and learning objectives across the country. The pedagogical approach, as embedded within a Mathematics context, was inherently focused on problem-solving and calculation, equipping students with the procedural knowledge needed to understand tax computations.

4. Discussion

The comparative analysis of tax education policies in Indonesia and Malaysia reveals two fundamentally different philosophies and strategic choices in cultivating the next generation of taxpayers. While both nations shared the common goal of improving tax compliance, their pathways diverged significantly, offering critical insights for policy learning.⁹ This

discussion interprets these findings, exploring the strengths and weaknesses of each model and the implications for future policy development, particularly for Indonesia. The juxtaposition of these two national strategies illuminates a core tension in educational policy design: the trade-off between systemic efficiency and pedagogical depth. Malaysia's approach epitomizes a model of systemic efficiency. By formally integrating tax education into the Form 5 Mathematics curriculum, the Malaysian government made a decisive policy choice to ensure universal, standardized, and mandatory delivery. The primary strength of this model is its structural integrity and reach. It guarantees that every student within the national school system is exposed to a baseline level of tax knowledge, delivered by trained teachers who are part of the existing educational infrastructure.¹⁰ This overcomes the significant challenges of reach, consistency, and sustainability that plague voluntary, event-based programs. From a policy implementation perspective, this centralized, top-down approach is a powerful mechanism for rapid and uniform dissemination. It transforms tax education from a peripheral concern into a core academic requirement, signaling its importance to students, teachers, and parents alike. This strategy aligns with a rationalist view of policymaking, where a clearly identified problem, in this case low tax compliance under a Self-Assessment System, is met with a direct, logical, and scalable solution.

However, the very source of the Malaysian model's strength—its placement within Mathematics—also gives rise to its primary theoretical and pedagogical limitation. Framing taxation as a component of "Consumer Mathematics" inherently orients the subject toward a specific epistemological lens. It defines tax knowledge primarily as procedural and calculative. The curriculum standards, which focus on performing calculations and solving problems involving various taxes, reinforce this view. While this approach is highly effective for developing a specific dimension of financial literacy, namely the ability to compute tax liabilities, it risks reducing the rich, multifaceted concept of taxation to a mere set of algorithms.¹¹ This perspective aligns with a more

traditional, knowledge-transmission model of education, where the goal is to equip students with a defined set of practical skills. What may be lost in this approach is the deeper, more complex understanding of taxation as a cornerstone of the social contract and a fundamental act of civic participation. The ethical, social, and political dimensions of taxation—questions of fairness, redistribution, public goods, and trust in government—are less likely to be the central focus of a mathematics lesson. This is not to say such discussions are impossible, but the curricular home of the subject strongly shapes its pedagogical identity and the nature of the classroom discourse.¹¹

In stark contrast, Indonesia's current approach, while structurally weaker, contains the seeds of a more pedagogically profound and holistic model. The historical reliance on extracurricular programs like *Pajak Bertutur*, led by the Directorate General of Taxes, represents a "push" model of information delivery. The strengths of this model are its use of subject matter experts (tax officials) and its patriotic framing of taxation as a form of *gotong royong* and the "backbone of the country." However, as the results indicated, this model suffers from significant structural deficiencies. Its extracurricular nature means it lacks universal reach and is often a one-off intervention.¹¹ Research has shown that such programs are most effective for students who already possess some familiarity with the topic, functioning more as a reinforcement mechanism than a foundational educational tool. This conditional effectiveness highlights a fundamental pedagogical mismatch: a single dose of information is insufficient to build a complex schema of understanding from scratch.¹² Furthermore, the reliance on tax officials, who are not trained educators, and the decentralized implementation by regional offices lead to a high degree of heterogeneity in quality and delivery, a classic challenge in a country as vast and diverse as Indonesia.

The true potential of the Indonesian model, however, lies not in its current state but in the transformative possibilities offered by the *Kurikulum Merdeka*.¹² This new curriculum represents a fundamental shift in educational philosophy, moving away from rote memorization and toward student-

centered, inquiry-based learning. Its emphasis on developing a "Pancasila Student Profile"—a set of character traits including critical reasoning, creativity, independence, and collaboration (*gotong royong*)—provides a powerful, culturally resonant framework for reframing tax education. The most promising vehicle for this is the *Projek Penguatan Profil Pelajar Pancasila* (P5), a mandatory, cross-disciplinary, project-based learning component. This framework allows for the exploration of taxation not as an abstract set of rules or calculations, but as a tangible, real-world civic inquiry.¹² A P5 project could involve students investigating local community needs, researching sources of public revenue, and designing a community budget, thereby forcing them to grapple with the direct link between taxes paid and services received. This approach aligns perfectly with constructivist learning theory, which posits that learners actively construct their own knowledge and understanding through experience and interaction with their environment.¹³ By engaging in such projects, students would not merely be receiving information about taxes; they would be constructing a deep, contextualized understanding of the fiscal-social contract. This method has the potential to cultivate not just tax literacy but a profound sense of tax morale, which public finance theory suggests is a more powerful and sustainable driver of voluntary compliance than mere knowledge of regulations. Tax morale is built on concepts of trust, fairness, and a sense of shared civic identity, all of which are more effectively nurtured through collaborative, community-engaged projects than through mathematical problem sets.¹⁴

This comparative analysis reveals that the critical factor differentiating the two national approaches is the nature and maturity of their institutional architecture. The successful integration of tax education in Malaysia was predicated on a deep and operational partnership between the Ministry of Education (KPM) and the Inland Revenue Board of Malaysia (IRBM). This synergy was essential; the KPM provided the curricular structure and the delivery mechanism (the school system and its teachers), while the IRBM supplied the technical expertise and the policy impetus.¹⁵ This represents a successful case of

inter-agency collaboration where two distinct governmental bodies worked in concert to achieve a shared national objective. In Indonesia, the relationship between the DJP and *Kemendikbudristek*, while formalized through a Memorandum of Understanding, was found to be in its "early stages" of operationalization. The current model, where the DJP leads outreach programs that are brought to schools, positions the education ministry as a passive facilitator rather than an active co-owner of the educational mission. This institutional gap is the single greatest barrier to Indonesia realizing the potential of the *Kurikulum Merdeka* for tax education. To move forward, this partnership must evolve from a formal agreement to a working collaboration focused on the co-design of curriculum content, teaching modules (*modul ajar*), and, most importantly, comprehensive teacher professional development programs. Without this deep collaboration, tax education will remain a peripheral activity, and the transformative potential of the P5 framework will go unrealized.¹⁶

The implications for the role of the teacher in each model are also profound. In Malaysia, the mathematics teacher is now a tax educator. This policy choice leverages an existing, highly skilled workforce and integrates the new responsibility into their established professional identity. While this requires targeted training to ensure teachers are comfortable with the new content, it is a structurally efficient solution. In Indonesia, a future integrated model would likely place the responsibility on Economics or Civics teachers. This would necessitate a significant investment in building their capacity, not just in terms of tax knowledge, but in what educational theorists call Pedagogical Content Knowledge (PCK)—the specialized knowledge required to effectively teach a specific subject.¹⁷ It is not enough for a teacher to understand tax law; they must understand how to make those complex concepts accessible, relevant, and engaging for adolescent learners. They must be able to anticipate student misconceptions, use appropriate analogies and examples, and connect the abstract principles of taxation to the lived realities of their students. A successful transition in Indonesia

would therefore depend entirely on the quality and scale of the professional development provided to these teachers.

Ultimately, this study highlights a fundamental choice in the strategic framing of tax education. Malaysia has chosen to frame it primarily as an issue of financial literacy, a practical, individual skill necessary for navigating the modern economy.¹⁸ This is a pragmatic and valuable goal. Indonesia, through its patriotic messaging and the civic-oriented philosophy of its new curriculum, has the opportunity to frame tax education as an issue of civic citizenship. This is a more ambitious and complex goal, aiming to shape not just what students know, but who they are as members of a national community. It seeks to build an identity where paying taxes is seen not as a burden to be minimized, but as a proud and essential contribution to the collective good—the very essence of *gotong royong*. While the path of systemic integration chosen by Malaysia offers a clear and efficient model, the more challenging, pedagogically ambitious path available to Indonesia may, in the long run, prove more powerful in building the deep-seated, voluntary tax culture that both nations aspire to create. The Indonesian case suggests that the ultimate goal of tax education should not be merely to produce compliant taxpayers, but to cultivate engaged, responsible, and fiscally conscious citizens.¹⁹

5. Conclusion

This comparative policy analysis of high school tax education in Indonesia and Malaysia has illuminated two distinct strategic approaches to fostering a tax-aware citizenry. Malaysia has pursued a path of formal, centralized integration by embedding taxation within its national Mathematics curriculum, a model that ensures universal and systematic delivery and champions a vision of tax education as a key component of practical financial literacy. In contrast, Indonesia's efforts have historically been characterized by a decentralized, extracurricular model led by its tax authority, which, while valuable in its patriotic framing, has inherent limitations in reach and sustainability. The primary conclusion drawn from this comparison is that for Indonesia to achieve its

long-term goal of building a robust tax culture, a strategic shift from its current ad-hoc model toward a more systematic, curriculum-integrated approach is imperative. The Malaysian case serves as a powerful and proximate example of how such integration can be achieved through deliberate policy design and effective inter-agency collaboration.

However, the analysis also reveals that Indonesia should not simply replicate the Malaysian model. The ongoing educational transformation through the *Kurikulum Merdeka* presents a unique and powerful opportunity to forge a different, more holistic path. By strategically leveraging the project-based, cross-disciplinary framework of the *Projek Penguatan Profil Pelajar Pancasila* (P5), Indonesia can move beyond a purely calculative understanding of taxation. It has the chance to embed tax education within a rich context of civic inquiry, directly linking the fiscal responsibilities of individuals to the collective well-being of the community and the national value of *gotong royong*. This approach would transform the subject from a technical lesson in economics or math into a foundational pillar of citizenship education, fostering the critical thinking, collaborative spirit, and civic-mindedness envisioned in the Pancasila Student Profile. By learning from the structural clarity of its neighbor while capitalizing on the pedagogical innovation of its own new curriculum, Indonesia has a unique opportunity to design a world-class tax education system. Such a system would not only enhance future tax compliance but would also contribute significantly to the development of an informed, engaged, and fiscally conscious generation, which is the ultimate foundation for achieving the "Indonesia Emas 2045" vision.

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